

# EXHIBIT 6

## Judd Burstein

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**From:** Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>  
**Sent:** Saturday, April 9, 2022 11:54 AM  
**To:** Judd Burstein  
**Subject:** Fwd: Steve Gordon Declaration  
**Attachments:** Gordon Decl In Response to Blackburn-signed.pdf

Hey Judd,

Just confirming that you received this and my wife's. I'm not sure if the Court will hear your motion this week, but I will be seeking to intervene to seek sanctions against Tyrone myself. My only issue is that I will not be able to do so until the following week.

Hopefully, between us — given the impending publication of Tyrone's declaration, my boss, family and others very close to me believe it is in my best interest to make this a mental health week. If Tyrone learns of such, he might believe that he has won by hurting me. But it's more so that I can be at my best when moving against him.

By the way, I hope that you have made a speedy recovery from bronchitis.

Thank you,

Steve

----- Forwarded message -----

From: **Steven Gordon** <[sg@nytlaw.com](mailto:sg@nytlaw.com)>  
Date: Fri, Apr 8, 2022 at 2:32 PM  
Subject: Steve Gordon Declaration  
To: <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>

--

Steven N. Gordon, Esq.  
Tsyngauz & Associates, P.C.  
114 Mulberry Street, Ground Floor  
New York, NY 10013  
Telephone: (212) 337-9770  
Facsimile: (212) 337-3375  
Email: [sg@nytlaw.com](mailto:sg@nytlaw.com)

**Judd Burstein**

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**From:** Steven Gordon <sg@nytlaw.com>  
**Sent:** Friday, April 8, 2022 3:20 PM  
**To:** Judd Burstein  
**Subject:** Steve Gordon Declaration  
**Attachments:** Gordon Decl In Response to Blackburn-signed.pdf

**Judd Burstein**

---

**From:** Steven Gordon <sg@nytlaw.com>  
**Sent:** Friday, April 8, 2022 2:32 PM  
**To:** Judd Burstein  
**Subject:** Mrs. Gordon Declaration  
**Attachments:** Mrs. Gordon Decl. in Response to Blackburn-signed.pdf

**Judd Burstein**

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**From:** Steven Gordon <sg@nytlaw.com>  
**Sent:** Friday, April 8, 2022 2:32 PM  
**To:** Judd Burstein  
**Subject:** Steve Gordon Declaration  
**Attachments:** Gordon Decl In Response to Blackburn-signed.pdf

## Judd Burstein

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**From:** Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>  
**Sent:** Friday, April 8, 2022 2:10 PM  
**To:** Judd Burstein  
**Subject:** Re: I need your final executed Declaration TODAY!

Yes, sorry, wanted to send you final in word first to confirm format. Will send over momentarily.  
On Fri, Apr 8, 2022 at 2:07 PM Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)> wrote:

----- Forwarded message -----

From: **Judd Burstein** <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>  
Date: Fri, Apr 8, 2022 at 2:06 PM  
Subject: RE: I need your final executed Declaration TODAY!  
To: Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>

Nothing signed??

Judd Burstein

Judd Burstein, P.C.

[260 Madison Avenue](#)

[New York, New York 10016](#)

(212) 974-2400 (Main Number)

(917) 687-2981 (Direct)

**PLEASE EXCUSE TYPOS AND GRAMMATICAL ERRORS, AS I AM A TERRIBLE TYPIST AND AN EVEN WORSE PROOFREADER.**

---

**From:** Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>  
**Sent:** Friday, April 8, 2022 12:38 PM  
**To:** Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>  
**Subject:** Re: I need your final executed Declaration TODAY!

Judd,

Attached please find the final executed Declarations from my wife and I.

On Fri, Apr 8, 2022 at 11:19 AM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

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**From:** Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>  
**Sent:** Thursday, April 7, 2022 4:43 PM  
**To:** Judd Burstein  
**Subject:** Re: Timing

Ah, yes, those were early on. I will revise. Thanks.

On Thu, Apr 7, 2022 at 4:40 PM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

As I said, I do not want to edit anything. But I think your claim that we never communicated with each other outside Of Tyrone's presence is inaccurate. I recall that we had a few entirely appropriate telephone conversations about procedural issues and my view that you would never get a default judgment. But if that is not your recollection, you should keep it the way it is.

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**To:** Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>  
**Subject:** Re: Timing

Sorry, Judd. I will definitely have them to you before 4 PM today.

On Thu, Apr 7, 2022 at 10:08 AM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

Just to let you know, everyone in the firm (including me) is overwhelmed with other work due early next week. So, I am going to finish writing my response **today** come hell or high water. Hence, if you want me to include a substantive discussion of his accusations against you in my papers, I need your Declarations no later than 4 today. If I don't get them, I will have to limit myself to denying that we colluded and arguing that his accusations are irrelevant while acknowledging that I have not been provided with an evidentiary basis for addressing their bona fides.

But this is up to you. If you feel you need more time to perfect your response, then you should take it. Obviously, while I do not believe that I need Declarations from you and your wife, they would be helpful to Nicki and I would therefore prefer to have them. They would also provide you with an immediate forum to dispute his accusations now, as opposed to having them out there on the court docket with no formal response from you until you can file a bundled set of papers in accordance with an agreed-upon briefing schedule for your anticipated intervention motion (unless you move by Order to Show Cause and I am not

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**From:** Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>  
**Sent:** Thursday, April 7, 2022 4:31 PM  
**To:** Judd Burstein  
**Subject:** Re: Timing

No, thank you.

On Thu, Apr 7, 2022 at 4:30 PM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

Great. Thanks

Judd Burstein

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**Judd Burstein**

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**To:** Steven Gordon  
**Subject:** WTF?

Why do you keep telling me that you will give me something by X, but then don't do it.. Just send me what you have now so that I can start incorporating it even if you intend to edit it. I am running out of patience. Please don't string me along If you are not going to deliver, just let me know.

You are the only one who is going to suffer from having these terrible allegations out there against you with nothing on record to

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Great. Thanks

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## Judd Burstein

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**Sent:** Thursday, April 7, 2022 3:05 PM  
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**Subject:** Re: Timing

If you get them in substantively final form, you can get me the executed version tomorrow

Get [Outlook for Android](#)

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**Judd Burstein**

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**From:** Judd Burstein  
**Sent:** Tuesday, April 5, 2022 2:12 PM  
**To:** Steven Gordon  
**Subject:** RE: If you want me to file a Declaration from you, I need it by tomorrow

Nope

Judd Burstein  
Judd Burstein, P.C.  
260 Madison Avenue  
New York, New York 10016  
(212) 974-2400 (Main Number)  
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Email: [sg@nytlaw.com](mailto:sg@nytlaw.com)

**Judd Burstein**

---

**From:** Judd Burstein  
**Sent:** Tuesday, April 5, 2022 1:20 PM  
**To:** Steven Gordon  
**Subject:** If you want me to file a Declaration from you, I need it by tomorrow

Judd Burstein  
Judd Burstein, P.C.  
260 Madison Avenue  
New York, New York 10016  
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## Judd Burstein

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**From:** Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>  
**Sent:** Thursday, March 31, 2022 11:22 AM  
**To:** Judd Burstein  
**Subject:** Re: No big rush

Oh, man. Feel better, Judd. Thanks for this update and the adjournment is very helpful -- I am trying to get them done but, as you know, we just learned about his declaration and I have several deadlines this week. I will nonetheless still get them to you ASAP.

On Wed, Mar 30, 2022 at 9:22 PM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

I have been ill with Bronchitis and Tyrone consented to a week adjournment

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**From:** Judd Burstein  
**Sent:** Wednesday, March 30, 2022 12:37 PM  
**To:** Steven Gordon  
**Subject:** RE: ETA?

Yes, please do. He is not going to back down. It is not his style.

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**Subject:** Re: ETA?

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## Judd Burstein

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**From:** Judd Burstein  
**Sent:** Wednesday, March 30, 2022 12:36 PM  
**To:** Tyrone Blackburn  
**Cc:** Emily Finestone; Peter B. Schalk; Victor Weberman; Steven Gordon  
**Subject:** Hough v. Maraj

Tyrone:

By reason of the Court's bundling rule, your reply papers will not be filed until Monday. I therefore want to give you an opportunity to amend your opposition to my motion to remove (a) your accusations against Steven Gordon and (b) the new accusation concerning Nicki's brother and her supposed "reputation of supporting sex offenders." If you want to adjust the motion schedule by a week to delete these portions of your response, I am amenable. If not, I will rely upon your refusal of this offer as an additional ground for sanctions.

Your inflammatory accusations concerning Steven's alleged personal problems and his supposed interactions with your client are entirely irrelevant to the motion and I just do not understand why you would include them for any reason other than for the improper purpose of inflicting some sort of revenge upon him. I do not have any personal knowledge about Steven's interactions with others or the personal problems which you allege. However, even if everything you say is true, it would be morally wrong for you to tar a young lawyer with these kinds of accusations when they are entirely gratuitous. I have been practicing law for more than 40 years, so my reputation will weather your sanctionable "sick obsession" comments about me. But if you force me to file your opposition papers, anyone contemplating hiring Steven in the future as an employee or as an attorney will likely find these accusations when they do a Google search on him. Why would you do this to him when the accusations add nothing to your response to the motion? Indeed, if they are true, that would be **more** of a reason not to include them because doing so would only unnecessarily cause him additional emotional damage. I have no allegiance to or even fondness of Steven. I am just looking at this from a decency perspective.

You should also withdraw the new allegation against Nicki because it is both entirely gratuitous and nonsensical. How is a supposed "reputation" for protecting sex offenders relevant here? Why do you say that she undertook a PR campaign when you have no evidence of anything she did in that regard? Moreover, the fact that someone might pay for her own brother's defense counsel does not show support for sex offenders in general. Using the term "information and belief" is not a license for ugly speculation

Tyrone, there is a difference between expressing an opinion and making factual allegations. Your response's invective about my supposed cretinous and bedwetting, etc., discussion of the case law is an opinion. I think your choice to use that language in a court filing is inappropriate and likely sanctionable, but you are nonetheless only expressing a personal opinion with which the Court can agree or disagree without knowledge of underlying facts. But your comments about Steven and Nicki are entirely different because you are abusing the litigation privilege to make gratuitous **factual** statements which cannot be tested without a full factual inquiry unavailable to them at this time.

Please just take a step back and do the right thing.

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My wife is furious because he was supposed to be her friend and he is stating blatant lies about me and framing them as if he got such from her. Every single paragraph concerning me is false. He even lied by saying that I asked him to join the case -- he called my wife and asked her for my number to ask me to join. I have evidence to refute everything that he says about me.

If he actually knew me, and had a "firsthand account from my family," he'd know that, in 2017, I lost my very best friend of 20 years from drug addiction, the trauma from which I was only recently able to address. But that was only after it started causing me nightmares and insomnia after my wedding because I did not have my best man next to me on one of the most special days of my life. And I had never fully addressed the guilt I had from feeling like I did not do more to help him. Tyrone was at my wedding when I gave a toast to my best friend, Nick. And I'm pretty sure it was well-known how he died. Perhaps that's why he is making that up about me or maybe I'm just venting right now. There's a lot swirling around in my head right now.

I worked very hard to get where I am in life. Neither of my parents are educated, nor have or had much. They separated when I was at a young age, causing me to be the caretaker for my younger sister until I graduated high school. I'm bi-racial and went to a high school that was 99% white upper-middle class students. So, I was the poor minority student who received free lunch from the school. And now I have this despicable person lying about me to tarnish my reputation and ruin my career.

I'm not a perfect person and I have my shortcomings but I am a very good person who would do anything for anyone. I worked my ass off for Tyrone and Jennifer but this is apparently retribution for me not bending the knee because I did not agree with something.

Sorry for venting. Just very confused why someone is trying to do this to me.

I'll have the declarations to you soon. I'm also going to try to move for a TRO to preemptively strike his declaration or have it filed under seal.

On Wed, Mar 30, 2022 at 11:27 AM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

Following up with my thoughts, recognizing that you should be deciding this on your own or with your own expert counsel:

1. Anything he said to you about what Hough said to him after you withdrew could not possibly be privileged because he is revealing it. If he violated the privilege, that's his problem because your privilege obligations to her ended once you withdrew. At this point, it is no different than if he told me what she had supposedly said. I would be free to communicate it to the court.

2. I think the fact that she did not file an affidavit makes it problematic to disclose otherwise privileged communications between the two of while you were still representing her. Maybe he can waive it for her, and if your lawyer says it's OJK, that's your choice. Personally, I would not get that close to the line because it will create an ancillary dispute for you over whether you did something wrong, especially since you can simply dispute specific statements and conduct between you and Jennifer without disclosing what was actually said -- while making clear that you are not giving more detail because of privilege concerns
3. Because it is helpful to Nicki, I am gin all events going to make clear in my papers that you were , in my view, overly-rigorous in refusing to disclose information to me during our sanctions discussions notwithstanding my efforts to convince you that you could disclose it without breaking privilege.

But I do want to make things clear: while I of course would like you to do so, I am not asking you to provide a Declaration because I don't absolutely need it. I believe that nothing he says about you is remotely relevant to my motion (which is why his offensive and gratuitous attacks upon you is just more evidence of bad faith.) I am, however, providing you the opportunity to do so because our interests are aligned in a limited way to the extent that a declaration from you would be helpful, although not essential to Nicki, and it will allow you to avoid a situation where you have no immediate vehicle to dispute him when the bundled papers are filed because you cannot preemptively file a motion based upon something which has not yet been filed. Instead, you will have nothing in the court record until you are permitted to intervene and file a motion (which I think is what you have to do).

On the latter note, you may want to see if you can reach agreement with him on (a) whether he will consent to you intervening to make a sanctions motion and (b) a schedule for either the intervention motion (which would attach your proposed motion) or the sanctions motion itself.

Steve: You and I have had our differences, and you know that I am very critical about how the Hough case was handled when you were involved. But on a human level (and as evidenced by the redactions I made to our email correspondence), I would **never** do anything so cruel and unnecessary to someone even if I could do so truthfully. He is really a disgraceful human being.,

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Judd Burstein

Judd Burstein, P.C.

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**Sent:** Wednesday, March 30, 2022 10:06 AM  
**To:** Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>  
**Subject:** Re: ETA?

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## Judd Burstein

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**Sent:** Wednesday, March 30, 2022 10:22 AM  
**To:** Steven Gordon  
**Subject:** Re: ETA?

You should. I suppose that the issue is whether he can waive it for her. However, you are always free to deny saying something that would have privileged if it had been said

Up to you, but a declaration saying that she never told him about drug use and that it was her comment on YouTube, would be helpful. I could redact her name at your request, although the email address you often use has her name.

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**Sent:** Wednesday, March 30, 2022 10:05:48 AM  
**To:** Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>  
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**Judd Burstein**

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**From:** Judd Burstein  
**Sent:** Tuesday, March 29, 2022 10:17 AM  
**To:** Steven Gordon  
**Subject:** RE: Tyrone Declaration about you

I also think it may be helpful to have a declaration from your wife

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**To:** Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>  
**Subject:** Re: Tyrone Declaration about you

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**Sent:** Tuesday, March 29, 2022 10:12 AM

**To:** Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>

**Subject:** Re: Tyrone Declaration about you

Ok, Judd, I will give you a declaration by the end of the week.

On Tue, Mar 29, 2022 at 10:10 AM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

It will be filed with the Court.

Steven: Steven, you cannot sue for defamation (at least now) because his Declaration is protected by the litigation privilege and is therefore non-actionable. If you were to sue, it would be dismissed for that reason. At this point, your only option -- **and it is your choice because, although I would like a Declaration from you, his accusations against you do not help him vis a vis Nicki** -- is to sign a declaration disputing it which I can submit with my reply. If you want to file one, send me a draft. My papers are due on Monday

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**From:** Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>

**Sent:** Tuesday, March 29, 2022 10:04 AM

**To:** Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>

**Subject:** Re: Tyrone Declaration about you

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**From:** Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>  
**Sent:** Tuesday, March 29, 2022 10:04 AM  
**To:** Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>  
**Subject:** Re: Tyrone Declaration about you

This is filed with the Court? It's filled with lies so I will be suing him for defamation

On Tue, Mar 29, 2022 at 7:51 AM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

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Judd Burstein

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## Judd Burstein

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**From:** Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>  
**Sent:** Tuesday, March 29, 2022 10:12 AM  
**To:** Judd Burstein  
**Subject:** Re: Tyrone Declaration about you

Ok, Judd, I will give you a declaration by the end of the week.

On Tue, Mar 29, 2022 at 10:10 AM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

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Steven: Steven, you cannot sue for defamation (at least now) because his Declaration is protected by the litigation privilege and is therefore non-actionable. If you were to sue, it would be dismissed for that reason. At this point, your only option -- **and it is your choice because, although I would like a Declaration from you, his accusations against you do not help him vis a vis Nicki** -- is to sign a declaration disputing it which I can submit with my reply. If you want to file one, send me a draft. My papers are due on Monday

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**To:** Steven Gordon  
**Subject:** Tyrone Declaration about you  
**Attachments:** Tyrone Declaration re Steven Gordon.pdf

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